

**INITIAL/INTERIM POLLUTION REPORT
LIBBY ASBESTOS SITE
OPERABLE UNIT 3**

W.R. GRACE FORMER MINE SITE

Date: June 13, 2013
Site Name: Libby Asbestos Site OU3 (Former Mine Site)
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POLREP No: Initial/Interim POLREP for OU3
W.R. Grace Former Mine Site

Site No.: 08BC
Response Authority: CERCLA Removal Action
CERCLIS No: MT0009083840
NPL Listing: 10/23/02
Action Memorandum Amendment: 8/31/12
Start Date: 9/29/12

I. PURPOSE

The subject of this pollution report is to document the initiation of the removal of asbestos-containing vermiculite waste material from the Rainy Creek floodplain south of and below the “Ampitheater” at OU3. This pollution report also documents progress made to date on this removal response.

II. BACKGROUND

The Libby Asbestos Superfund Site (Libby site) is located in and around the Town of Libby, Montana. Libby is the county seat of Lincoln County and is in the northwest corner of Montana, about 35 miles east of Idaho and 65 miles south of Canada. Operable Unit 3 (OU3) is one of eight OUs at the site and is comprised of the W.R. Grace former mine site and surrounding areas. The former mine is approximately 6.5 miles east of Libby, Montana. The disturbed area of the mine property is approximately 1,100 acres.

Vermiculite was mined beginning in the early 20th century; from 1963 through 1990, the mine, mills and associated processes were operated by the W.R. Grace & Company (Grace).

While considering various alignments for re-routing Rainy Creek as part of a preliminary evaluation of potential site remediation scenarios, Libby amphibole asbestos-containing vermiculite waste was discovered in October 2011. The waste is present in an area of approximately five acres below the Amphitheater, north and south of the Rainy Creek channel. The estimated average thickness of the vermiculite waste was about 12 inches based upon information gathered from test pits. A visual estimate of the extent of Libby amphibole asbestos-containing vermiculite waste was made based on color of the material which is easily delineated from native soil by its dark grey to whitish hue, as well as the differences in vegetation density and type growing on the waste material when compared to surrounding soil. Given these assumptions, the volume of the contaminated vermiculite was estimated to be about 8,100 cubic yards.

III. REMOVAL ACTIVITIES TO DATE

Grace agreed to perform the cleanup at the Libby rail yard under an Administrative Order on Consent (AOC). Grace's work plan and sampling plan were approved on September 17, 2012. Asbestos-contaminated vermiculite waste was removed from the site below the OU3 amphitheater from September 29, 2012 through October 19, 2012. The depth of excavation was determined by visual estimation, differentiating underlying native soil from the dark grey to whitish hue of the asbestos-containing vermiculite waste. Samples were collected for the purpose of characterizing the remaining soil prior to backfilling the area. In 2012, 1,089 truckloads with a total of 13,068 cubic yards of vermiculite waste was removed and placed at the top of the mine site. Prior to shut down, appropriate best management practices (BMPs) and erosion controls were installed around the excavation area and along the Rainy Creek channel to minimize erosion of material during spring runoff and future storm events. Due to the onset of winter weather conditions, a significant portion of the removal area was not able to be backfilled with OU4 soils from the amphitheater and the area was not reseeded.

Work is scheduled to resume on June 19, 2013. Upon start up, the excavated area will be backfilled with OU4 soils and areas that had not been addressed in 2012 will be excavated, sampled, and backfilled. BMPs and erosion protection will be evaluated and additional measures taken as needed to minimize erosion of material into the creek channel. Once backfilling has been completed, the entire area will be reseeded with the standard seed mix that is applied to the OU4 soils at the top of the mine site.

IV. ENFORCEMENT

An Administrative Order on Consent (AOC) was entered into between the U.S. EPA and the W.R. Grace & Co. and Kootenai Development Corporation, effective September 24, 2012. This AOC provides for the performance of a removal action by Grace and the reimbursement of certain response costs incurred by the United States at or in connection with Grace property comprising the former Libby mine site in Libby, Montana.

V. COST INFORMATION

Not applicable. This was a PRP-Lead Removal Action. The Action Memorandum Amendment, dated August 31, 2012, estimated the cost of the cleanup to be \$155,360.

VI. DISPOSITION OF WASTES

To mitigate the potential for Libby amphibole asbestos in the waste vermiculite to contaminate lower Rainy Creek, the waste material has been excavated and transported to the disposal area at the top of the former mine. This is the same area that is used to dispose of Libby amphibole asbestos-contaminated soil removed as part of the residential cleanups in Libby and Troy.